

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Cause No. 4:14CR00361CDP/NAB
v.)	
)	
SHOICHI OKADA,)	
)	
Defendant.)	

MOTION FOR TRAVEL PERMIT

Comes now, the Defendant and requests this Honorable Court grant permission for travel outside of the Eastern District of Missouri to Springfield, Virginia, in order to move his family and complete a Japanese Proficiency test. Defendant also requests permission to stay in Virginia until December 12, 2015. In support of this motion, the Defendant states as follows:

1. Defendant is charged with one count of possession of child pornography in violation of 18 USC § 2252A(a)(5)(B).
2. The Defendant has been on bond since November 4, 2014 and regularly reports to Pre-trial Release as a condition of his bond.
3. As an additional condition of his bond Mr. Okada is required to remain within the Eastern District of Missouri while his case is pending.
4. Last year Mr. Okada was granted permission to travel to visit his wife's family in Virginia over the holiday season.
5. In light of the pending plea and sentence in this case, the defendant's wife and son will be moving in with his wife's family. The Defendant would like to travel with his family to the

same address, 8434 Rainbow Bridge Lane, Springfield, Virginia, 22153-2510, where he visited last year, the home of his wife's aunt and uncle.

6. Additionally, the Defendant has a Japanese Language Proficiency test scheduled for December 6, 2015. This test is offered in Washington, D.C. a short drive from the home where his family will be staying.

7. The defendant and his wife are both aware that he is not allowed to have any unsupervised contact with minors or be the only adult in the presence of minor children. Defendant will continue to abide by this condition of his bond and his wife is aware of this condition and has agreed to enforce it as well.

8. Counsel for the Defendant has discussed this travel request with both AUSA Robert Livergood and with Pretrial Officer, Lisa Lazier. The Defendant also discussed this request with District Judge Perry at the Status Conference on November 5, 2015.

9. If required the Defendant is willing to wear a GPS monitoring device while he is outside the jurisdiction.

10. The Defendant will be moving his belongings out of his home on November 19 and 20, 2015. The closing on their St. Louis residence is November 20, 2015. On that day he requests permission to leave the jurisdiction and drive to Virginia.

11. He is scheduled to take the Japanese Proficiency test on December 6, 2015. He would like to spend Thanksgiving and sometime in early December with his family and then return to the Eastern District on December 11 or 12th.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests permission to travel outside the Eastern District of Missouri from November 20, 2015 until December 12, 2015 in order to move his family.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,
ATTORNEYS AT LAW, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Mr. Robert Livergood
Asst. United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri, 63102

By: /s/ Daniel A. Juengel
DANIEL A. JUENGEL